

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff

Case No.
Hon.

-vs-

SYNECTICS MEDIA INC.

Defendants

COMPLAINT

The United States of America brings this action to enforce a promissory note by the United States Small Business Association (“SBA”).

PARTIES

1. The Plaintiff is the United States of America. The SBA is an agency of the United States that provides support to entrepreneurs and small businesses.
2. Synectics Media, Inc. (“Synectics”) is a Michigan limited liability company; its resident agent is Gregory R. Evans, who lists REDACTED, Royal Oak, MI 48067 as his address with the Michigan Department of Licensing and Regulatory Affairs (“LARA”).

JURISDICTION AND VENUE

3. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.

§§ 1331, 1332, 1345, and 1355.

4. The Court may exercise personal jurisdiction over Synectics because it maintains a registered office in this judicial district.
5. The Court may exercise personal jurisdiction over Synectics because a substantial part of the acts and omissions giving right to the United States' claim occurred here.
6. This judicial district is a proper venue pursuant to 28 U.S.C. §§ 1391(b) and 1395(a) because Synectics maintains a registered office in this judicial district and because a substantial part of the acts and omissions giving rise to the United States' claim occurred here.

COUNT I-ENFORCEMENT OF PROMISSORY NOTE

7. On April 12, 2013, Synectics signed and delivered a note promising to pay Citizens Bank the sum of \$150,000.00 with interest at the rate of 5.25 percent.
Exhibit A-April 12, 2013 Promissory Note.
8. On October 1, 2015, Synectics signed and delivered a restatement/renewal and replacement of the April 12, 2013 promissory note in the amount of \$350,000.00 with FirstMerit Bank, N.A. *See Exhibit B-October 1, 2015 Restated Promissory Note.*
9. The October 1, 2015 Promissory Note required payment to commence on November 12, 2015, but at some point, Synectics defaulted on this obligation.

10. FirstMerit Bank N.A. was acquired by Huntington National Bank, which in turn assigned the loan described above to the SBA on or about January 25, 2021.

Exhibit C-Assignment.

11. On June 8, 2022, the Department of the Treasury, Bureau of the Fiscal Service issued a demand to Synectics seeking payment of the then-outstanding balance on said loan of \$454,006.33.

12. Synectics has refused or is unable to pay the outstanding balance on the loan, which is currently \$526,628.99.

WHEREFORE, the United States respectfully requests that the Court:

- A. Enter judgment against Synectics in the amount of \$526,628.99 as of September 12, 2024, plus accrued interest, fees and other accruals to present;
- B. Impose post-judgment interest at the statutory rate pursuant to *28 U.S.C. § 1961* until Synectics' debt is paid in full;
- C. Grant such other proper relief as this court may deem just and proper.

Respectfully submitted,

DAWN N. ISON
United States Attorney

/s/Peter F. Schneider
Peter F. Schneider (P75256)
Assistant U.S. Attorney
211 W. Fort St., Ste. 2001
Detroit, Michigan 48226
(313) 226-9100
peter.schneider@usdoj.gov